

# EXHIBIT 9

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**STEVEN HOTZE, M.D.; WENDELL  
CHAMPION; HON. STEVE TOTH; and  
SHARON HEMPHILL,**

**Plaintiffs,**

**v.**

**CHRIS HOLLINS, in his official capacity  
as Harris County Clerk,**

**Defendant.**

**Case No.: 4:20-cv-03709**

**DECLARATION OF ELIZABETH FURLER  
(pursuant to 28 U.S.C. § 1746)**

My name is Elizabeth Furler. I am over the age of 21 and fully competent to make this declaration. Under penalty of perjury, I declare the following based upon my personal knowledge:

1. I currently live in Houston, Texas and am a registered voter at my current address. I have been registered in this county for twenty years. I vote in every election because I believe it is my civic responsibility. I believe that if you don't vote, you don't have a right to complain.

2. I am 53 years old, white, and a registered Republican. My husband and son are Republicans and are in the NRA. My son is a competitive shooter.

3. I have several preexisting medical conditions. I have Common Variable Immunodeficiency, an antibody deficiency that makes your immune system unable to defend against viruses, and Sjogren's Syndrome, another autoimmune disease. I am also Lupus positive. My health condition weighed in to my decision to cast my ballot via drive-thru voting.

4. I have a medically fragile, 22-year-old son with a neurological autoimmune disease. COVID-19 could kill him, so my family keeps potential COVID-19 exposure at an absolute minimum. Any time I go out to run an errand, I know I'm running a great risk.

5. On October 27, 2020, I cast my vote in the November General Election at the Houston Community College drive-thru polling site. I chose to vote early to make sure my vote got counted and to avoid long lines.

6. The drive-thru voting felt safe and secure. As I drove up to the drive-thru polling site, a man directed me to my own tent. The poll-worker asked for my driver's license and entered my information into their log, like they do in person. I signed their document and received an authorized code. The man wore a mask the whole time.

7. I learned about drive-thru voting from social media. It felt just like in-person voting. I was the only voter in my car. The poll-worker handed me the touchscreen machine, then stood ten feet away from my vehicle as I voted. There were signs saying no electronic devices were allowed. I cast my vote exactly as I would have inside the facility.

8. Drive-thru voting was an obvious choice, as it presented a clear opportunity to minimize risks to myself and my family. I'm strict with my COVID-19 safety practices. I always wear a mask in public. I don't touch doorknobs and handles. I work in speech therapy, but I conduct it mostly via teletherapy. My family tries to social-distance at all times. We exclusively socialize with our "pod" of fourteen people. I avoid crowds and enclosed spaces.

9. I believe this is a very important election year, so if my ballot from drive-thru voting were invalidated, I would do everything in my power to vote in person on Election Day. But it would be a big burden. I'd have to rearrange my entire work schedule. Worse, I'd have to risk not only my own health, but the health and well-being of my son.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 1, 2020

/s/Elizabeth Furler  
Elizabeth Furler